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By ECF

January 9, 2024

The Honorable Richard M. Gergel  
United States District Court  
for the District of South Carolina  
P.O. Box 835  
Charleston, South Carolina 29402

**Re: *Tyco Fire Products LP v. AIU Ins. Co., et al.*, No. 2:23-cv-02384 (D.S.C.)**

Dear Judge Gergel:

We write on behalf of Plaintiff Tyco Fire Products LP (“Tyco”), with the consent of the AIG Defendants, in connection with Tyco’s Motion to Compel Production of Documents by AIG (ECF 202).<sup>1</sup> The AIG Defendants’ response to the motion is due today.

Tyco and the AIG Defendants have renewed their discussions regarding the subject matter of the motion. As a result of those discussions, Tyco and the AIG Defendants believe that they can narrow, and perhaps eliminate, some of the topics that are the subject of Tyco’s motion.

Accordingly, and to lessen burdens on the Court, Tyco and AIG respectfully request that the Court extend AIG’s deadline for responding to Tyco’s motion to **January 12** and Tyco’s deadline for replying to **January 16** (accounting for the Martin Luther King holiday). The parties will be sure that any further update or briefing reflects whatever agreement they may be able to reach. Tyco will not contend that a response filed by the AIG Defendants on or before January 12 is untimely.

The parties appreciate the Court’s ongoing attention to this matter.

Respectfully,

/s/ Allan B. Moore

Allan B. Moore

Cc: All Counsel of Record (by ECF)

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<sup>1</sup> The AIG Defendants are AIU Insurance Company, American Home Assurance Company, Granite State Insurance Company, Insurance Company of the State of Pennsylvania, National Union Fire Insurance Company of Pittsburgh, Pa., and New Hampshire Insurance Company.